EXHIBIT "Q"

```
1
               THE UNITED STATES DISTRICT COURT
          FOR THE EASTERN DISTRICT OF PENNSYLVANIA
2
    EVELYN CINTRON
                                     CIVIL ACTION NO.
3
                                     19-4078
                  Plaintiff
4
               v.
5
    CITY OF PHILADELPHIA, et al
6
                  Defendants
7
8
9
                 Thursday, November 16, 2023
10
                 Oral deposition of ROBIN WIMBERLY, was
11
12
    taken by telephonic/video conference commencing at
13
    10:00 a.m., and reported stenographically by
14
    Dominique R. Caputo, Professional Court Reporter and
15
    Notary Public.
16
17
18
19
20
21
22
23
24
25
```

```
1
    APPEARANCES:
2
3
    MINCEY, FITZPATRICK, ROSS, LLC
    BY: THOMAS O. FITZPATRICK, ESQUIRE
4
        ISAAC H. GREEN, ESOUIRE
    One Liberty Place
5
    1650 Market Street, 36th Floor
    Philadelphia, Pennsylvania 19103
6
    (215)587-0006
    tom@minceyfitzross.com
7
    Counsel for Plaintiff
8
9
    CITY LAW DEPARTMENT
    BY: SHARON ULAK, ESQUIRE
10
    1515 Arch Street, 14th Floor
    Philadelphia, Pennsylvania 19103
11
    (215)683-5083
    sharon.ulak@phila.gov
    Counsel for Defendant
12
13
14
    O'HAGAN MEYER
    BY: KEVIN GOLDEN, ESQUIRE
15
    1717 Arch Street, Suite 3910
    Philadelphia, Pennsylvania 19103
16
    (215)461-3323
    kgolden@ohaganmeyer.com
17
    Counsel for Defendant
18
19
    ALSO PRESENT:
20
    Evelyn Cintron
21
22
23
24
25
```

1		INDEX		
2				
3	WITNESS NAME			PAGE NO.
4	ROBIN WIMBERLY			
5	DIRECT EXAMINATION B	BY MR. FITZPATRIC	!K	4
6				
7				
8		EXHIBITS		
9				
10	EXHIBIT D	DESCRIPTION	PAGE	MENTIONED
11	(No exhibits were m	narked for identi	ficat	cion.)
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				

25

1	Cintron that she try to remain, correct?			
2	A Yes.			
3	Q Okay, and do you recall Lieutenant Cintron			
4	complaining about the treatment that she had			
5	received from Deputy Commissioner Sullivan?			
6	A No.			
7	Q Do you recall Lieutenant Cintron saying			
8	that she felt as though she was in a hostile work			
9	environment?			
10	A No.			
11	Q Do you recall Lieutenant Cintron			
12	complaining about the work conditions at PAL?			
13	A No, she didn't complain about that to me.			
14	Q Then what is it that you do recall about			
15	Lieutenant Cintron's complaints?			
16	A What I recall about the conversation? Is			
17	that what you are referring to when I was speaking			
18	with her after the exit interview?			
19	Q Yes, ma'am.			
20	A That she was very stressed out and her			
21	doctor said it was best for her not to be in the			
22	department, but we did not talk about her specifics			
23	about what was going on with her and her job, no.			
24	Q At any point have you discussed specifics			

concerning her treatment or the way that she felt